

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK#

In re:

IIG Global Trade Finance Fund Ltd. (in
Official Liquidation), *et al.*,

Debtors.

IIG Global Trade Finance Fund Limited (in
Official Liquidation), IIG Structured Trade
Finance Fund Limited (in Official
Liquidation), Christopher Kennedy and
Alexander Lawson, as assignees of the
creditors of IIG Global Trade Finance Fund
Limited (in Official Liquidation) and the
creditors of IIG Structured Trade Finance
Fund Limited (in Official Liquidation) and
Christopher Kennedy and Alexander Lawson
in their capacities as Joint Official Liquidators
of IIG Global Trade Finance Fund Limited (in
Official Liquidation), IIG Structured Trade
Finance Fund Limited (in Official
Liquidation),

Plaintiffs,

v.

International Investment Group L.L.C., Trade
Finance Trust, Deutsche Bank Trust Company
Americas, Assured Investment Management
LLC (f/k/a BlueMountain Capital
Management, LLC), Tennenbaum Capital
Partners, LLC, KKR Credit Advisors (US)
LLC, Elanus Capital Management, LLC,
BlueMountain Foinaven Master Fund L.P.,
BlueMountain Logan Opportunities Master
Fund L.P., BlueMountain Montenvers Master
Fund SCA SICAV-SIF, BlueMountain
Timberline Ltd., BlueMountain Kicking Horse
Fund L.P., BlueMountain Credit Opportunities
Master Fund I L.P., Tennenbaum Senior Loan

Case No. 20-10132 (MEW)

Chapter 15

Jointly Administered

Adv. Pro. No. 23-01165 (MEW)

Fund IV-B, LP, Tennenbaum Senior Loan
Fund II, LP, Tennenbaum Senior Loan
Operating III, LLC, Corporate Capital Trust,
Inc., KKR Debt Investors II (2006) (Ireland)
L.P., KKR TRS Holdings, Ltd., KKR-PBPR
Capital Partners L.P., Special Value
Continuation Partners, LP, and Elanus Capital
Investments Master SP Series 1, John Doe
Subsequent Transferees 1-10,000,

Defendants.

**STIPULATION AND ORDER GRANTING A PAGE LIMIT EXTENSION AND
PERMITTING THE FILING OF SUPPLEMENTAL BRIEFS**

This Stipulation is entered into by and between IIG Global Trade Finance Fund Limited (in Official Liquidation), IIG Structured Trade Finance Fund Limited (in Official Liquidation), Christopher Kennedy and Alexander Lawson, as assignees of the creditors of IIG Global Trade Finance Fund Limited (in Official Liquidation) and the creditors of IIG Structured Trade Finance Fund Limited (in Official Liquidation) and Christopher Kennedy and Alexander Lawson in their capacities as Joint Official Liquidators of IIG Global Trade Finance Fund Limited (in Official Liquidation), IIG Structured Trade Finance fund Limited (in Official Liquidation) (together, “Plaintiffs”) and Assured Investment Management LLC (f/k/a BlueMountain Capital Management, LLC), BlueMountain Foinaven Master Fund L.P., BlueMountain Logan Opportunities Master Fund L.P., BlueMountain Montenvers Master Fund SCA SICAV-SIF, BlueMountain Timberline Ltd., and BlueMountain Kicking Horse Fund L.P., Tennenbaum Capital Partners, LLC and Tennenbaum Senior Loan Fund IV-B, LP, Tennenbaum Senior Loan Fund II, LP, Tennenbaum Senior Loan Fund III, LP, and Special Value Continuation Partners, LLC, Corporate Capital Trust, Inc., KKR Credit Advisors (US) LLC, KKR Debt Investors II (2006) (Ireland) L.P., KKR TRS Holdings, Ltd., and KKR-PBPR Capital Partners L.P., and Elanus

Capital Management, LLC and Elanus Capital Investments Master SP Series 1 (together, the “Noteholders”) by and through their respective undersigned counsel.

WHEREAS, on August 31, 2023, Plaintiffs filed an adversary complaint [Dkt. No. 1] (the “Complaint”) against the Defendants to commence the above-captioned adversary proceeding; and

WHEREAS, on September 20, 2023, this Court entered a Stipulation and Order setting a deadline of November 6, 2023 for the Noteholders to move to dismiss, answer, or otherwise respond to the Complaint; and

WHEREAS, the Noteholders and Plaintiffs have conferred and agreed upon a briefing proposal for the Noteholders’ forthcoming motions to dismiss the Complaint (the “Motions to Dismiss”); and

WHEREAS, the Court held a telephonic hearing on November 1, 2023 during which time the Noteholders presented their proposal;

NOW, THEREFORE, IT IS STIPULATED AND AGREED, AS FOLLOWS:

1. The Noteholders may submit a single joint brief of no more than 75 pages in support of their Motions to Dismiss that raises arguments common to the Noteholders.
2. Each of the BlueMountain Entities, the Elanus Entities, the KKR Entities, and the Tennenbaum Entities may submit a supplemental brief of no more than 15 pages raising any additional arguments specific to that group of Noteholders.

Respectfully submitted this 2nd day of November, 2023.

/s Rachel K. Warren

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Attorneys for Elanus Capital Management LLC and Elanus Capital Investment Master SPC on behalf of, and in the name of, Elanus Capital Investments Master SP Series 1

SO ORDERED:

Dated: November 3, 2023

/s/ Michael E. Wiles

THE HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE